

Exhibit F



In Re New Jersey Tax Sales Certificates Antitrust Litigation – Suggested Notice Plan

Gilardi & Co. LLC (Gilardi) and Larkspur Design Group (LDG) are informed the proposed class will be made up of New Jersey residents. Specifically, LDG understands the settlement class is defined as:

All persons who owned real property in the State of New Jersey who had a Tax Sale Certificate issued with respect to their property that was purchased by a Settling Defendant from January 1998 through February 2009 at a public auction in the State of New Jersey at an interest rate above zero percent.

Direct Notice to Class Members

LDG will cause direct notice to be provided to class members for whom contact information is available. LDG is informed that this information is available for approximately 55%¹ of the Class. Notice postcards will be mailed via First Class Mail and handled according to the procedures below.

Before mailing, Class Member addresses will be updated using the United States Postal Service's National Change of Address system (NCOA). The NCOA system provides updated addresses for all individuals who have filed a change of address with the post office within the past four years. The NCOA system helps to ensure that the notice is mailed to the most current address on file with the USPS and minimizes returned undeliverable mail (RUM).

Any RUM received will be sorted and scanned. For RUM returned without a forwarding address, Gilardi uses Accurant (a division of Lexis-Nexis) to perform a basic "skip trace" search in order to retrieve the most accurate and updated information. We will update our database with the new addresses found and re-mail the Notice to those Class Members.

Publication (Indirect) Notice

To supplement the direct notice mailing, LDG has developed a publication notice plan designed to reach unidentified class members. The proposed publication notice program consists of print publication, online advertising, earned online media, and a party-neutral press release.

LDG will publish the summary notice in the following print publications as follows:

Frequency	Publication Name	Ad Unit Size
1x	Newark Star-Ledger	Approx. 5" x 7"
1x	The Record (Hackensack)	Approx. 5" x 7"
1x	Trentonian	Approx. 5" x 7"
1x	Courier-Post	Approx. 5" x 7"
1x	Atlantic City Press	Approx. 5" x 7"

¹ Based on the data Gilardi and LDG currently have and expect to receive.

LDG will also implement an online advertising program targeting individuals who reside in New Jersey and seek financial information. Specifically, campaigns will be run on the following channels:

- Sponsored link advertising through Google and Yahoo!/Bing
- Banner advertisements on Xaxis, a nationally recognized ad network
- Text link and display advertising on Facebook

Ads will target potential class members on the basis of relevant website content and searches performed. Contextually targeted advertising matches ads based on relevance to advertiser-specified keywords. Sponsored link ads appear on results pages of the major search engines when a user performs a search for an advertiser-specified keyword. These ads help “close the loop” in a notice campaign and direct potential class members to the case website where they can review the full notice and other relevant documents.

LDG also recommends notice via press release; once released, a newswire piece is available for up to 30 days to media outlets for further distribution. An additional benefit to press releases is that they help control the tone and messaging around an announcement.

In addition, as part of our outreach efforts, LDG will assemble a dedicated outreach team to research, monitor, and respond to the target audience via social media and other internet channels. LDG staff will monitor online Blogs, identify individuals influential in areas related to the litigation (i.e. Real Estate Investing), and encourage them to publish or pass on the case website link to their followers. LDG believes this will be an effective tactic not only to generate traffic to the website, but also to instill confidence that the site is credible and secure for claimants to provide their personal information. In this case that would be experts in the fields of real estate in general, real estate investing, social media and class action litigation.

Case Website

Gilardi will implement and maintain a matter-specific website where the long-form notice and other relevant court documents will be posted and available for download.

Telephone and Email Support

Gilardi will provide telephone and written help services through a case-dedicated toll-free line and email address. Our telephone support system will provide class members with case information via interactive menu and provide the option to speak with a live operator. Gilardi staff will also field written inquiries received through USPS mail and the case-dedicated email address.